

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)	
)	
Use of Spectrum Bands Above 24 GHz)	
For Mobile Radio Services)	GN Docket No. 14-177
)	
Establishing a More Flexible Framework to)	
Facilitate Satellite Operations in the)	
27.5-28.35 GHz and 37.5-40 GHz Bands)	IB Docket No. 15-256
)	
Amendment of Parts 1, 22, 24, 27, 74, 80, 90,)	
95, and 101 To Establish Uniform License)	
Renewal, Discontinuance of Operation, and)	
Geographic Partitioning and Spectrum)	
Disaggregation Rules and Policies for Certain)	
Wireless Radio Services)	WT Docket No. 10-112
)	
Allocation and Designation of Spectrum for)	
Fixed-Satellite Services in the 37.5-38.5 GHz,)	
40.5-41.5 GHz and 48.2-50.2 GHz Frequency)	
Bands; Allocation of Spectrum to Upgrade)	
Fixed and Mobile Allocations in the)	
40.5-42.5 GHz Frequency Band; Allocation of)	
Spectrum in the 46.9-47.0 GHz Frequency)	
Band for Wireless Services; and Allocation of)	
Spectrum in the 37.0- 38.0 GHz and 40.0-40.5)	
GHz for Government Operations)	IB Docket No. 97-95
To: Wireless Telecommunications Bureau		
Office of Engineering and Technology		

MOTION FOR EXTENSION OF TIME

Public Knowledge and Open Technology Institute (“Movants”) respectfully request a 14-day extension of time for the deadline to file oppositions and replies to oppositions to the Petitions for Reconsideration filed in the above-captioned dockets. Movants ask that oppositions be due January 31, 2017, and replies to oppositions be due February 10th, 2017.

Movants recognize that the Commission does not ordinarily grant such extensions¹, but in this case there is good cause to depart from general policy. Given the number of petitions, the complexity and diversity of issues raised, and the timing of the filing of Petitions and their publication around the holidays, it is appropriate that additional time be granted.

Movants note that there are a large number of technically detailed Petitions that require analysis and response. This is understandable, given the large number of complex issues addressed in the Order.² Given the diversity and complexity of issues raised by the 13 Petitions, it would be appropriate for the Commission to grant an extension of time to ensure that it has before it a robust and fully developed record upon which to rely as it reviews these Petitions.

Furthermore, the timing of the filing of these Petitions and the Commission's submission of them for Publication in the Federal Register has had the effect of reducing the time for response. The Commission publicly noticed the petitions only three days before the Christmas holiday and they were published in the Federal Register on the last business day before the New Year's holiday weekend. One of the telecommunications industry's major trade shows - the Consumer Electronics Show - falls in the interim window, as does a further Federal holiday weekend, in celebration of Martin Luther King, Jr. In sum, the automatic time for response established the Commission's rules is exceptionally burdensome on interested parties during the tail end of a very busy holiday season, and an extension is therefore warranted.

¹ 47 CFR § 1.46(a).

² *Use of Spectrum Bands Above 24 GHz For Mobile Radio Services et al.*, GN Docket No. 14-177 *et al.*, *Report and Order and Further Notice of Proposed Rulemaking*, FCC 16-89 (rel. July 14, 2016). The Order was published in the Federal Register on November 14, 2016. *Use of Spectrum Bands Above 24 GHz for Mobile Radio Services*, 91 Fed. Reg. 79,894 (Nov. 14, 2016).

Movants note that neither the Commission nor any other party will be unduly burdened by granting additional time to respond to these Petitions. Given the complexity of the issues at play, and the diversity of viewpoints represented in this proceeding, it is in the Commission's interest to ensure that all parties have adequate time to fully address these complex and critical issues. An extension of 14 days will not unduly delay the resolution of this proceeding.

Movants have advised all parties which filed Petitions for Reconsideration of our request via email. NCTA – The Internet & Television Association, T-Mobile, VIASAT, INC, Competitive Carriers Association, Echostar, Nextlink Wireless, and Boeing responded that they had no objections to Movants' request.

For the foregoing reasons, Movants ask that the Commission extend the filing deadlines for Oppositions and Replies in this proceeding to January 31, 2017, and February 10, 2017, respectively, and grant all such other relief as may be just and proper.

Respectfully Submitted,

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January 6, 2017